DATE 5/21/87

CA D064573108

INSPECTOR Roy Thielking
George Baker

Inspection Report
U.S. Environmental Protection Agency
Region 9
Toxics and Waste Management Division
Field Operations Branch

(DOHS - SCS)

Purpose: ANNUAL EVALUATION INSPECTION

Facility Name: Whittaker - Bermite Division

Street: 22116 Soledad Cyn Rd

City: Saugus **State:** **Zip Code:** 91350

EPA ID number: CAD064573108

Report Number:

Date of Investigation: 5-21-87

EPA Inspector(s): ϕ

State Inspector(s): Roy Thielking, Geo. Baker

Facility Representative(s): John S. Pelagrin, Consultant

Report Prepared By: George Baker Roy Thielking
Date of Report: 5-21-87

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INSPECTOR RT, GB

Form A - Interim Status Standards for Facilities that Treat, Store or Dispose of Hazardous Waste

I. General Information:

(A) Operator: Bermite Div Whittaker Corp.

Street: 22116 Soledad Canyon Rd.

City: Saugus State: CA Zip Code:

(B) Owner: WHITTAKER CORPORATION

Street: 10880 WILSHIRE BLVD

City: Los Angeles State: CA Zip Code: 90024-9990

(C) Site RCRA Activity: None

___ Generation: Complete Form B

___ Transportation: Complete Form C

___ Small Quantity Generator: Complete Form D

___ Recycler: Complete Form E

Storage: None

___ Container (S01)

___ Tank (S02)

___ Waste Pile (S03)

___ Surface Impoundment (S04)

Disposal: None

___ Injection Well (D79)

___ Landfill (D80)

___ Land Application (D81)

___ Ocean Disposal (D82)

___ Surface Impoundment (D83)

Treatment: None

___ Tank (T01)

___ Surface Impoundment (T02)

___ Incinerator (T03)

___ Other (T04)

Process Code:

Design Capacity:

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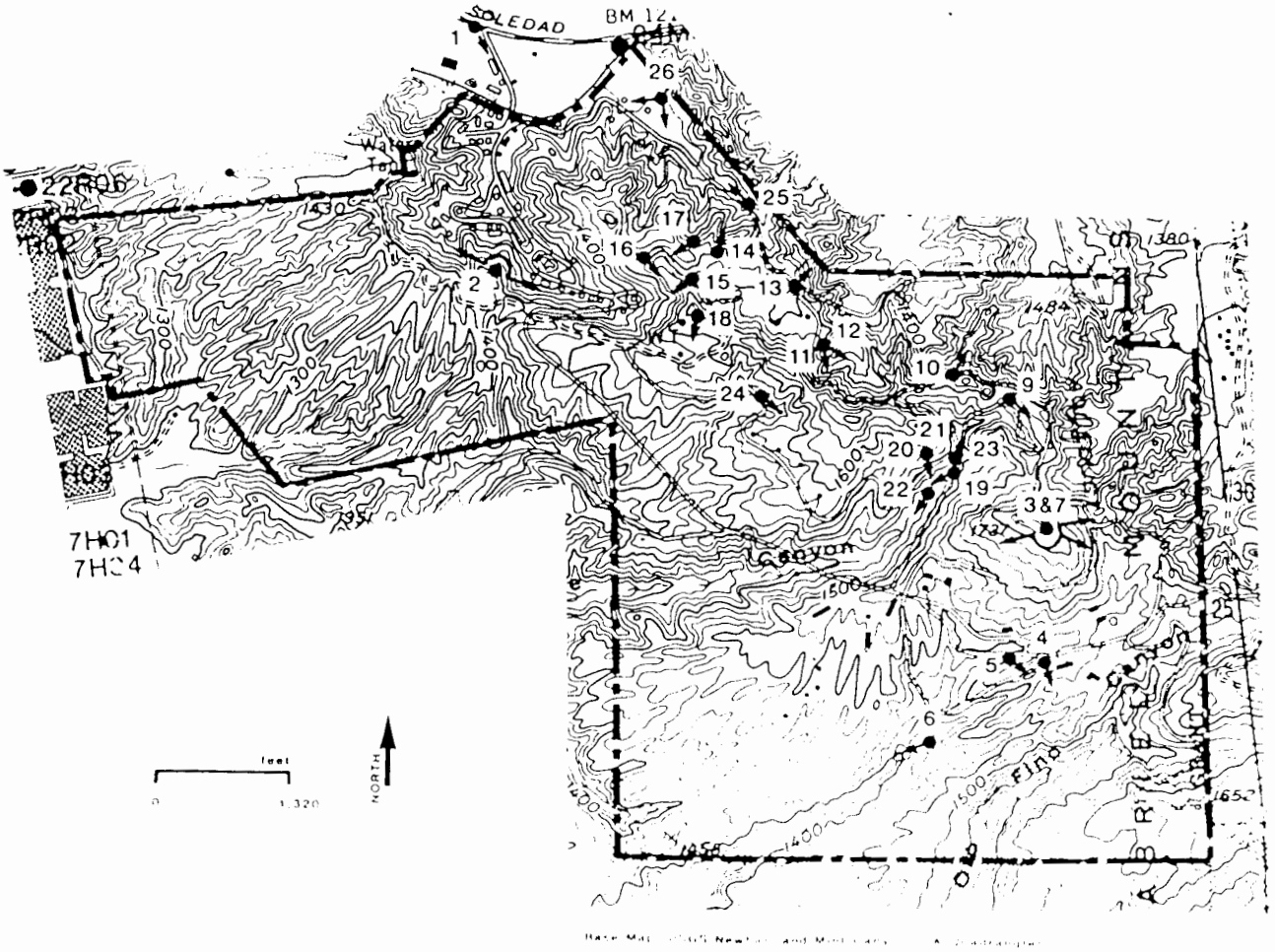
CAD 064 573 108



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II. Interim Status:
(Part 270 Subpart G)

	Yes	No	Comments
(A) Qualifying For Interim Status:			
1. For the existing facility to be treated as having been issued a permit, the facility must have:			
a. Submitted a notification of H.W. activity (270.70a.1)?	✓		
b. Submitted Part A of the permit application (270.70a.2)?	✓		
c. Achieved compliance with RCRA interim status standards (270.70b)?	✓		
(B) Operating During Interim Status:			
1. Has the facility complied with the following restrictions:			Not evaluated - facility is undergoing closure and all manufacturing or other hazardous waste generation is discontinued.
a. Has only treated, stored or disposed of H.W. specified in the Part A (270.71a.1)?	N/A		
b. Has only employed processes specified in the Part A (270.71a.2)?			
c. Has not exceeded design capacities specified in the Part A (270.71a.3)?			
(C) Changes During Interim Status:			
1. Has a revised Part A been submitted prior to the following changes:			Not Evaluated - All RCRA units are being closed.
a. T/S/D of H.W. not previously identified in the Part A (270.72a)?			
b. Increases in design capacity of processes (270.72b)?			
c. Changes in or additions to processes (270.72c)?			
d. Change in ownership (270.72d)?			
e. Have the changes made not amounted to reconstruction (270.72e)?			

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INSPECTOR RT, GB

III. General Facility Standards: (Part 265 Subpart B)

	Yes	No	Comments
(A) Required Notices:			
1. Has the RA been notified regarding the receipt of H.W. from a foreign source (265.12a)?	___	___	NA - no wastes received from offsite.
2. Before transferring ownership, has the facility notified the new owners in writing of the requirements of Parts 265 and 122 (265.12b)?	___	___	NA - no ownership changes
(B) General Waste Analysis:			
1. Has the facility obtained a detailed chemical and physical analysis of each H.W. (265.13a.1)?	___	___	NA - no longer generating or handling hazardous wastes
2. Does the analysis contain all information that must be known to properly treat, store or dispose of the H.W. (265.13a.1)?	___	___	
3. Does the facility have records documenting the required H.W. analysis, e.g., lab reports, published data, generator supplied data (265.13a.2)?	___	___	
4. Has the analysis been repeated to ensure that it is accurate and up-to-date (265.13a.3)?	___	___	
5. Is the analysis repeated when there is a change in the process (265.13a.3)?	___	___	
6. For off-site facilities, is the analysis repeated when the H.W. received does not match the H.W. designated on the manifest (265.13a.3)?	___	___	
7. For off-site facilities, does the facility inspect or analyze each movement of H.W. to verify that the H.W. received matches the identity of the H.W. specified on the manifest (265.13a.4)?	___	___	

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INSPECTOR GB, RT

III. General Facility Standards: - Continued
(Part 265 Subpart B)

	Yes	No	Comments
8. Does the facility have a detailed waste analysis plan (265.13b)?	___	___	NA - see above
9. Does the facility follow the procedures specified in the waste analysis plan (265.13b)?	___	___	
10. Does the waste analysis plan contain the following elements:			
a. Parameters of analysis of each H.W. handled (265.13b.1)?	___	___	
b. Rationale for the selection of each parameter (265.13b.2)?	___	___	
c. Test methods used to obtain a representative sample of H.W. (265.13b.3)?	___	___	
d. Frequency which each analysis will be repeated (265.13b.4)?	___	___	
e. For off-site facilities, the analysis that generators have agreed to supply (265.13b.5)?	___	___	NA - not receiving wastes
11. For off-site facilities, does the plan specify procedures for inspection or analysis of each movement of H.W. (265.13c)?	___	___	
12. For off-site facilities, does the plan contain the following elements:			
a. Description of procedures used to identify each movement of H.W. (265.13c.1)?	___	___	
b. Description of the sampling method used to obtain a representative sample of the H.W. (265.13c.2)?	___	___	

(C) Security:

1. Do security measures include:			
a. 24-hour surveillance (265.14b.1)?	✓	___	

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INSPECTOR RT, GB

III. General Facility Standards: - Continued
(Part 265 Subpart B)

	Yes	No	Comments
b. Artificial or natural barriers and controlled entry (265.14b.2)?	✓		
c. Signs with the legend "Danger- Unauthorized Personnel Keep Out" posted at entrances to active portions of facility (265.14c)?	✓		
(D) General Inspection Requirements:			
1. Does the facility inspect for equipment malfunctions and deterioration, operator errors, and H.W. discharges (265.15a)?			NA — no RCRA activity at present - all RCRA units being closed
2. Does the facility follow a written inspection schedule (265.15b.1)?			
3. Is the schedule kept at this facility (265.15b.2)?			
4. Does the schedule identify types of problems that are expected from malfunction, operator error, deterioration or discharges of all: (265.15b.3)			
a. monitoring equipment?			
b. safety, emergency equipment?			
c. security equipment?			
d. operating and structural equipment?			
5. Does the schedule indicate the frequency of inspection for each item (265.15b.4)?			
6. Does the schedule include daily inspections of loading and unloading areas (265.15b.4)?			
7. Has the facility taken remedial action to correct the problems revealed on an inspection (265.15c)?			

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INSPECTOR GB KT

III. General Facility Standards: - Continued
(Part 265 Subpart B)

	Yes	No	Comments
8. Are inspections recorded in an inspection log (265.15d)?	___	___	N/A see (D) 1. of previous page
9. Does the log include: (265.15d)			
a. Date and time of inspection?	___	___	
b. Name of inspector?	___	___	
c. Observations recorded?	___	___	
d. Date and nature of repairs or other remedial actions?	___	___	
10. Are inspection records kept for at least 3 years (265.15d)?	___	___	
(E) Personnel Training:			
1. Does the facility have a personnel training program (265.16a.1)?	X	___	
2. Is it directed by a person trained in H.W. management procedures (265.16a.2)?	X	___	
3. Does the program include training in: (265.16a.3)			
a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment?	X	___	
b. Emergency procedures including contingency plan implementation?	X	___	
4. Do new personnel receive required training within 6 months (265.16b)?	___	___	N/A - facility closing new hiring not expected.
5. Do personnel take part in an annual review of the initial training (265.16c)?	___	___	

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INSPECTOR G.S. RT

III. General Facility Standards: - Continued
(Part 265 Subpart B)

	Yes	No	Comments
6. Do personnel training records include: (265.16d)			
a. Job titles?	X	___	___
b. Job Descriptions?	X	___	___
c. Descriptions of training?	X	___	___
b. Records of training?	X	___	___
(F) Requirements For Ignitable, Reactive, Or Incompatible Wastes:			
1. Are the following precautions taken to prevent accidental ignition or reaction: (265.17a)			N/A to this section
a. Separation and protection from ignition sources?	___	___	___
b. No smoking signs in hazard areas?	___	___	___
2. Is the T/S/D of ignitable, reactive and incompatible waste conducted so that it does not: (265.17b)			
a. Generate extreme heat or pressure, fire or explosion, or violent reaction?	___	___	___
b. Produce uncontrolled toxic or flammable mists, fumes, dusts or gases?	___	___	___
c. Damage structural integrity of H.W. containment devices? (e.g., tanks, containers, liners)	___	___	___
d. Threaten human health or the environment?	___	___	___

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INSPECTOR GB, RT

IV. Preparedness and Prevention:
(Part 265 Subpart C)

	Yes	No	Comments
(A) Is the facility designed, constructed, maintained, and operated to minimize the possibility of fire, explosion, or releases of H.W. or H.W. constituents to air, soil, or surface water which could threaten human health or the environment (265.31)?			N/A - all units being closed.
(B) Required Equipment:			
1. Does the facility have the following equipment where applicable:			
a. Internal communications or alarm systems (265.32a)?			N/A - all hazardous wastes & materials have been removed from the facility.
b. Telephone or 2-way radios at the scene of operation (265.32b)?			
c. Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment (265.32c)?			
d. Water at adequate volume and pressure or foam producing equipment or automatic sprinklers (265.32d)?			
(C) Testing And Maintenance Of Equipment:			
1. Does the facility test and maintain emergency equipment in operable condition (265.33)?			
(D) Access To Communications Or Alarm Systems:			
1. Do personnel in areas where H.W. is being handled have immediate access to these systems (265.34)?			
(E) Required Aisle Space:			
1. Is their adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency (265.35)?			

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INSPECTOR RT, GB

IV. Preparedness and Prevention: - Continued
(Part 265 Subpart C)

	Yes	No	Comments
(F) Arrangements With Local Authorities:			
1. Has the facility made the following arrangements:			
a. Arrangements to familiarize police, fire dept., and emergency response team with H.W. operations (265.37a.1)?	X		
b. Agreements designating primary emergency authority (265.37a.2)?	X		
c. Agreements with State emergency response teams, contractors and equipment suppliers (265.37a.3)?	X		
d. Arrangements to familiarize local hospitals with the properties of H.W. and the types of potential injuries and illnesses from exposure to H.W. (265.37a.4)?	X		
2. Did the facility document in the operating record any refusal by State or local authorities to enter into such arrangements (265.37b)?	X		

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INSPECTOR RT, GB

V. Contingency Plan and Emergency Procedures:
(Part 265 Subpart D)

	Yes	No	Comments
(A) Does the facility have a contingency plan (265.51a)?	X		
(B) Content Of Contingency Plan:			
1. Does the plan describe actions personnel must take to comply with §§ 265.51 & 265.56 in response to fires, explosions, or unplanned releases of H.W. (265.52a)?	X		
2. Does the plan describe arrangements agreed by police, fire dept., hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to § 265.37 (265.52c)?	X		
3. Does the Plan list names, addresses, and phone numbers (office & home) of all persons qualified to act as emergency coordinators (265.52d)? (list in order of responsibility)	X		
4. Does the plan list all emergency equipment including the location and physical description of each item on the list and a brief outline of its capability (265.52e)?	Y		
5. Does the plan include an evacuation plan for personnel and a description of signals to begin evacuation, evacuation routes and alternate routes (265.52f)?	X		
(C) Copies of Contingency Plan:			
1. Is the plan maintained at the facility (265.53a)?	Y		
2. Has the plan been submitted to all local emergency organizations (265.53b)?	Y		

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INSPECTOR GB, RT

V. Contingency Plan and Emergency Procedures: - Con't.
(Part 265 Subpart D)

	Yes	No	Comments
(D) Amendment Of Contingency Plan:			
1. Has the plan been reviewed and immediately amended when required (265.54)?	___	___	N/A
(E) Emergency Coordinator:			
1. Is the coordinator familiar with all aspects of site operation and emergency procedures (265.55)?	___	___	___
2. Does the coordinator have authority to carry out the contingency plan (265.55)?	___	___	___
(F) Emergency Procedures:			
1. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in § 265.56 (265.56)?	___	___	___

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INSPECTOR G.B., RT

VI. Manifest System, Recordkeeping, and Reporting:
(Part 265 Subpart E)

	Yes	No	Comments
(A) Use of Manifest System:			
1. Does the facility comply with the following manifest requirements:			
a. Sign and date each copy of the manifest (265.71a.1)?	X		Review of past manifest
b. Note any significant * discrepancies in the manifest (265.71a.2)?	X		
c. Give transporter one copy of the signed manifest (265.71a.3)?	X		
d. Within 30 days after delivery, send a copy of the manifest to the generator (265.71a.4)?	Y		
2. Are records of past shipments retained for 3 years (265.71a.5)?	X		
(B) Manifest Discrepancies:			
1. Upon discovering a significant discrepancy, has the facility made an attempt to reconcile the discrepancy with the generator or transporter (265.72b)?			N/A
2. For discrepancies not reconciled within 15 days, has the facility followed the required reporting procedures (265.72b)?			↓
(C) Operating Record:			
1. Does the facility maintain an operating record (265.73a)?			N/A - closing

* Significant discrepancies are:
1. For bulk waste; variations > 10% in weight
2. For containerized waste; variations > one drum
3. Obvious differences such as waste solvent substituted for waste acid

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INSPECTOR GB, RT

VI. Manifest System, Recordkeeping, and Reporting: - Con't
(Part 265 Subpart E)

	Yes	No	Comments
2. Does the operating record contain the following information:			
a. A description and the quantity of each waste received (265.73b.1)?	—	—	N/A - not an off-site disposal facility
b. The method(s) and date(s) of its treatment, storage or disposal as required by Appendix I (265.73b.1)?	—	—	
c. The location of each waste within the facility and the quantity at each location (265.73b.2)? (This information must include cross-references to specific manifest numbers.)	—	—	
d. For disposal facilities, the location and quantity of each waste is recorded on a map or diagram of each cell or disposal area (265.73b.2)?	—	—	
e. Records and results of all waste analysis and trial tests (265.73b.3)?	X	—	
f. Reports detailing all incidents that required implementation of the contingency plan (265.73b.4)?	X	—	
g. Records and results of operator inspections (265.73b.5)?	X	—	
h. Monitoring data (265.73b.6)?	X	—	
i. All closure and post-closure costs as applicable (265.73b.7)?	X	—	
(D) Availability, Retention, Disposition Of Records:			
1. Are all records including plans available for inspection (265.74a)?	X	—	
2. Have copies of records of H.W. disposal locations and quantities under § 265.73b.2 been submitted to the RA and local land authority upon closure of the facility (265.74c)?	—	—	

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INSPECTOR GB/RT

VI. Manifest System, Recordkeeping, and Reporting: - Con't.
(Part 265 Subpart E)

	Yes	No	Comments
(E) Biennial Report:			
1. Has the facility submitted a biennial report to the RA by March 1 of each even numbered year (265.75)?	X		
2. Was the report submitted on EPA form 8700-13B and cover facility activities during the previous calendar year (265.75)?			
3. Does the report include the following infromation: (265.75)			
a. EPA identification number, name and address of the facility?			
b. Calendar year covered by report?			
c. For off-site facilities, the EPA identification number of each generator?			
d. Description and quantity of each H.W. received and, for off-site facilities, the EPA identification number of each generator listed with this information?			
e. Methods of treatment, storage, or disposal for each H.W.?			
f. Monitoring data under § 265.94a.2.ii and iii and b.2 ?			
g. Most recent closure and post-closure cost estimates?			
h. Required certification?			

BT-429-HWS BACK REV. 1 (2-87)
STATE OF CALIFORNIA

BOARD OF EQUALIZATION
EXCISE TAX UNIT

HAZARDOUS WASTE DISPOSAL REPORT — ANNUAL "SUPERFUND" TAX

FOR CALENDAR YEAR 1986

DATE 5/21/87

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INSPECTOR GB, RT

Note: Do not include wastes that are recycled or transported out of state for disposal.

"HAZARDOUS WASTE" means a waste, or combination of wastes, which because of its quantity, concentration, or physical chemical, or infectious characteristics may either:

a. Cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness.

b. Pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed of, or otherwise managed.

"EXTREMELY HAZARDOUS WASTE" means any hazardous waste or mixture of hazardous wastes which, if human exposure should occur, may likely result in death, disabling personal injury or serious illness caused by the hazardous waste or mixture of hazardous wastes because of its quantity, concentration, or chemical characteristics.

HAZARDOUS WASTE CATEGORIES	TOTAL TONS
A. The total tons of **HAZARDOUS** waste, the Federal Regulation of which has been suspended under the Solid Waste Disposal Act by Act of Congress, disposed of, or submitted for disposal, in California, plus the total tons of waste material transferred to a surface impoundment in California for the purpose of reducing the water content of such waste and material by evaporation, plus the total tons of hazardous waste disposed of into an injection well or landfarm, exclusive of the waste reported in Sections D and E. (NOTE: LAND FILL DISPOSAL IS NOT LAND FARMING.)	-0-
B. The total tons of **HAZARDOUS** waste disposed of, or submitted for disposal, in California exclusive of the waste reported in Sections A, C, D and E. **Note:** Land Fill Only	-150 Tons-
C. The total tons of **EXTREMELY HAZARDOUS** waste disposed of, or submitted for disposal, in California exclusive of the waste reported in Sections A, B, D and E. **Note:** Land Fill Only	-0-
D. The total tons of **HAZARDOUS** waste disposed of, or submitted for disposal, in California from the extraction, beneficiation and processing of ores or minerals including phosphate rock and overburden from mining of uranium ore.	-0-
E. The total tons of **HAZARDOUS** waste disposed of, or submitted for disposal, in California that is a solid hazardous waste residue resulting from incineration.	-0-

I hereby certify that this report, including any accompanying schedule and statement, has been examined by me and to the best of my knowledge and belief is a true, correct, and complete report.

SIGNATURE AND TITLE [signature] Controller (805) 259-2241 4/1/87
PHONE NUMBER DATE

If you have any questions regarding this report, please contact the State Board of Equalization, Excise Tax Unit, Phone (916) 322-9070

DATE 5/21/87

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INSPECTOR GB, RT

VI. Manifest System, Recordkeeping, and Reporting: - Con't
(Part 265 Subpart E)

	Yes	No	Comments
(F) Unmanifested Waste Report:			
1. For a facility that has accepted a H.W. from an off-site source without an accompanying manifest, was a report containing the required information submitted to the RA within 15 days after receiving the H.W. (265.76a-g)?	___	___	N/A
(G) Additional Reports:			
1. Has the facility reported to the RA: (265.77)			
a. Releases, fires and explosions?	Y	___	
b. Ground-water contamination and monitoring data?	~~Y~~	___	N/A - No GWM
c. Facility closure?	Y	___	

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INSPECTOR GB, BT

VII. Ground-Water Monitoring: (Part 265 Subpart F)

	Yes	No	Comments
(A) Has a ground-water monitoring program (capable of determining the facility's impact on the quality of ground-water in the uppermost aquifer underlying the facility) been implemented (265.90a)?		X	
(B) Ground-Water Monitoring System:			
1. Has at least one monitoring well been installed in the uppermost aquifer hydraulically upgradient from the limit of the waste management area (265.91a.1)?			N/A
a. Are ground-water samples from the uppermost aquifer representative of background ground-water quality and not affected by the facility? (as ensured by proper well number, locations and depths) (265.91a.1)			
2. Have at least three monitoring wells been installed hydraulically downgradient at the limit of the waste management area (265.91a.2)?			
a. Do well numbers, locations and depths ensure prompt detection of any statistically significant amounts of H.W. or H.W. constituents that migrate from the waste management area to the uppermost aquifer (265.91a.2)?			
3. Have the locations of the waste management areas been verified to conform with information in the ground-water program (265.91b)?			
a. If the facility contains multiple waste ma ment components, is each component adequately monitored (265.91 b & b.2)?			Y

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INSPECTOR GB RT

VII. Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

	Yes	No	Comments
4. Do the numbers, locations, and depths of the monitoring wells agree with the data in the ground-water monitoring system program (265.91b)?	—	—	N/A
5. Well completion details: (265.91c)			
a. Are wells properly cased?	—	—	
b. Are wells properly screened and packed where necessary to enable sampling at appropriate depths?	—	—	
c. Are annular spaces properly sealed to prevent contamination of ground-water?	—	—	
(C) Sampling And Analysis:			
1. Has a ground-water sampling and analysis plan been developed (265.92a)?	—	—	
a. Has it been followed?	—	—	
b. Is the plan kept at the facility?	—	—	
c. Does the plan include procedures and techniques for:			
i. Measurement of ground-water surface elevations (265.92a.1)?	—	—	
ii. Sample collection (265.92a.1)?	—	—	
iii. Sample preservation (265.92a.2)?	—	—	
iv. Sample shipment (265.92a.2)?	—	—	
v. Analytical procedures (265.92a.3)?	—	—	
vi. Chain of custody control (265.92a.4)?	—	—	

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INSPECTOR GB RT

VII. Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

	Yes	No	Comments
2. Are the required parameters in ground-water samples being tested quarterly for the first year (265.92b and 265.92c.1)?	___	___	N/A
a. Are the ground-water samples analyzed for parameters characterizing the suitability of the ground-water as a drinking water supply * (265.92b.1)?	___	___	
b. Are the ground-water samples analyzed for parameters establishing ground-water quality * (265.92b.2)?	___	___	
c. Are the ground-water samples analyzed for parameters used as indicators of ground-water contamination * (265.92b.3)?	___	___	
2. For each indicator parameter are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring (265.92c.2)?	___	___	
3. Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year (265.92c.2)?	___	___	

* EPA interim primary drinking water standards:
Arsenic, Barium, Cadmium, Chromium, Fluoride, Lead, Mercury, Nitrate(as N), Selenium, Silver Endrin, Lindane, Methoxychlor, Toxaphene, 2-4 D, 2,4,5-TP Silver, Radium, Gross Alpha, Gross Beta, Turbidity, Coliform Bacteria.

Parameters establishing ground-water quality:
Chloride, Iron, Manganese, Phenols, Sodium, Sulfate.

Parameters used as indicators of ground-water contamination:
pH, Specific Conductance, Total Organic Carbon, Total Organic Halogen.

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INSPECTOR GS, RT

VII. Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

	Yes	No	Comments
4. For facilities which have completed first year ground-water sampling and analysis requirements:			
a. Have samples been obtained and analyzed for the ground-water quality parameters at least annually (265.92d.1)?	___	___	N/A
b. Have samples been obtained and analyzed for the indicators of ground-water contamination at least semi-annually (265.92d.2)?	___	___	
5. Were ground-water surface elevations determined at each well each time a sample was taken (265.92e)?	___	___	
D) Preparation, Evaluation, And Response:			
1. Has an outline of a ground-water quality assessment program been prepared (265.93a)?	___	___	
a. Does it describe a program capable of determining:			
i. Whether H.W. or H.W. constituents have entered the ground-water (265.93a.1)?	___	___	
ii. The rate and extent of migration of H.W. or H.W. constituents (265.93a.2)?	___	___	
iii. Concentrations of H.W. or H.W. constituents in ground-water (265.93a.3)?	___	___	
2. After the first year of monitoring, have at least 4 replicate measurements of each indicator parameter been obtained for samples taken for each well (265.93b)?	___	___	

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INSPECTOR GB, KT

VII. Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

	Yes	No	Comments
a. Were the results compared with the initial background means from the upgradient well(s) determined during the first year (265.93b)?	___	___	N/A
i. Was each well considered individually (265.93b)?	___	___	
ii. Was the Student's t-test used (at the 0.01 level of significance) (265.93b)?	___	___	
b. Was a significant increase (or pH decrease) found in the:			
i. Upgradient wells?	___	___	
ii. Downgradient wells?	___	___	
If "Yes", complete the Compliance Form For A Facility Which May Be Affecting Ground-Water Quality.			
3. Were the ground-water surface elevations evaluated annually to determine whether the monitoring wells are properly placed (265.93f)?	___	___	
4. If it was determined that modification of the number, location or depth of monitoring wells was necessary, was system brought into compliance with 265.91a (265.93f)?	___	___	
(E) Recordkeeping And Reporting:			
1. Have records been kept of analysis for parameters in 265.92c and d (265.94a.1)?	___	___	
2. Have records been kept of ground-water surface elevations taken at the time of sampling for each well (265.94a.1)?	___	___	

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VII. Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

	Yes	No	Comments
3. Have records been kept of required evaluations in 265.93b (265.94a.1)?	___	___	N/A
4. Have the following been submitted to the RA: (265.94a.2)			
a. Initial background concentrations of parameters listed in 265.92b within 15 days after completing each quarterly analysis required during the first year?	___	___	
b. For each well, have any parameters whose concentrations or values have exceeded the maximum contaminant levels allowed in drinking water supplies been separately identified?	___	___	
c. Annual reports including:			
i. Concentrations or values of parameters used as indicators of ground-water contamination for each well along with required evaluations under 265.93b?	___	___	
ii. Any significant differences from initial background values in upgradient wells separately identified?	___	___	
iii. Results of the evaluation of ground-water elevations?	___	___	

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VII. Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

Compliance Form For A Facility Which May Be Affecting Ground-Water Quality

	Yes	No	Comments
1. Have comparisons of ground-water contamination indicator parameters for the upgradient well(s) shown a significant increase (or pH decrease) over initial background?	___	___	N/A
a. If "Yes", has this information been submitted to the RA according to 265.94a.2.ii (265.93c.1)?	___	___	
2. Have comparisons of indicator parameters for the downgradient wells shown a significant increase (or pH decrease) over initial background?	___	___	
a. If "Yes", were additional ground-water samples taken for those downgradient wells where the significant differences was determined (265.93c.2)?	___	___	
i. Were samples split in two?	___	___	
ii. Was the significant differences due to human (e.g., laboratory) error?	___	___	
If "Yes", do not continue			
3. If significant differences were not due to error, was a written notice sent to the RA within 7 days of confirmation (265.93d.1)?	___	___	
4. Within 15 days of notification to the RA was a certified ground-water quality assessment plan submitted (265.93d.	___	___	

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VII. Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

Compliance Form For A Facility Which May Be Affecting Ground-Water Quality

	Yes	No	Comments
5. Does the ground-water quality assessment plan specify: (265.93d.3)			
a. Monitoring well information including well numbers, locations and depths?	___	___	N/A
b. Sampling methods?	___	___	
c. Analytical methods?	___	___	
d. Evaluation methods?	___	___	
e. Schedule of implementation?	___	___	
6. Does the plan allow for determination of: (265.93d.4)			
a. Rate and extent of migration of H.W. or H.W. constituents?	___	___	
b. Concentrations of the H.W. or H.W. constituents?	___	___	
7. Is it indicated that the first determination was made as soon as technically feasible (265.93d.5)?	___	___	
a. Within 15 days after the first determination was a written report containing the assessment of ground-water quality submitted to the RA?	___	___	
8. Was it determined that H.W. or H.W. constituents from the facility have entered the ground-water?	___	___	
a. If "No", was the original indicator evaluation program, required by 265.92 and 65.93b, reinstated?	___	___	
b. Was the RA notified of the reinstatement of the program within 15 days of the determination (265.93d.6)?	___	___	

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VII. Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

Compliance Form For A Facility Which May Be Affecting Ground-Water Quality

	Yes	No	Comments
9. If it was determined that H.W. or H.W. constituents have entered the ground-water: (265.93d.7)			
a. For facilities where the program was implemented prior to final closure, are determinations of H.W or H.W. constituents continued on a quarterly basis (265.93d.7)? (If the program was implemented during the post-closure care period, determinations made in accordance with the ground-water quality assessment plan may cease after the first determination.)	___	___	~~N/A~~ N/A
b. Were subsequent ground-water quality reports submitted to the RA within 15 days of determination (265.93d.7)?	___	___	
c. Were records kept of the analysis and evaluations specified in the ground-water quality assessment (throughout the active life of the facility) (265.94b.1)?	___	___	
d. If a disposal facility, were (are) records kept throughout the post-closure period as well (265.94b.1)?	___	___	
10. Are annual reports submitted to the RA containing the results of the ground-water quality assessment program (265.94b.2)?	___	___	
a. Do the reports include the calculated or measured rate of migration of H.W. or H.W. constituents during the reporting period (265.94b.2)?	___	___	

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VII. Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

Compliance Form For Demonstrating A Waiver Of
Interim Status Requirements

	Yes	No	Comments
1. Is a written waiver demonstration kept at the site (265.90c)?	___	___	N/A
2. Is the demonstration certified by a qualified geologist or geotechnical engineer (265.90c)?	___	___	
3. Does the waiver demonstration establish the potential for migration of H.W. or H.W. constituents from the facility to the uppermost aquifer (265.90c.1)?	___	___	
a. Does the evaluation of a water balance include:			
i. Precipitation?	___	___	
ii. Evapotranspiration?	___	___	
iii. Runoff?	___	___	
iv. Infiltration? (including any liquid in surface impoundments)	___	___	
b. Does the evaluation of the unsaturated zone characteristics include:			
i. Geologic Materials?	___	___	
ii. Physical Properties?	___	___	
iii. Depth to ground-water?	___	___	
4. Does the waiver demonstration establish the potential for H.W. or H.W constituents which may enter the uppermost aquifer to migrate to a water supply well or surface water (265.90c.2)?	___	___	
a. Does the evaluation of the saturated zone characteristics include?			
i. Geologic materials?	___	___	
ii. Physical properties?	___	___	
iii. Rate of ground-water flow?	___	___	
iv. Proximity of the facility to water supply wells or surface water?	___	___	

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VIII. Closure and Post-Closure: (Part 265 Subpart G)

	Yes	No	Comments
(A) Closure Plan:			
1. Does the facility have a closure plan (265.112a)?	X		
2. Does the plan identify the steps necessary to completely or partially close the facility at any point during its intended operating life and to completely close at the end of its intended operating life (265.112a)?	X		
3. Do the steps to close in the plan include: (265.112a)			
a. Pre-treatment of H.W.?			N/A - No treatment or pretreatment done on site
b. Treatment of H.W.?			
c. Removal of H.W. from process units?	X		
d. Disposal of H.W.?	X		
e. Decontamination of equipment and structures?	X		
f. Scheduled inspections for closure certification purposes?	X		
3. Does the description of how and when the facility will be closed include the following elements:			
a. Maximum extent of operation which will be unclosed during the life of the facility (265.112a.1)?	N/A		Complete closure being implemented
For facilities that have designated H.W. management areas inactive prior to Nov. 19, 1980, are records available documenting the cessation of activity or final closure?			N/A
Was a Notification of Hazardous Waste Site submitted to EPA as required by § 103c of CERCLA ?			

VIII. Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	Yes	No	Comments
b. Estimate of the maximum inventory of H.W. in storage and in treatment at any time during the life of the facility (265.112a.2)?	___	___	N A - All Hazardous Wastes have been removed from storage units
c. Does the inventory include the maximum amount of on-site:			
H.W. in surface impoundments?	___	___	
H.W. in tanks?	___	___	
H.W. in piles?	___	___	
H.W. in containers?	___	___	
H.W. in drainage pits or sumps?	___	___	
Contaminated soil from spills or leaks?	___	___	
Contaminated soils and liners from non-disposal impoundments?	___	___	
Contaminated soils from land treatment fields?	___	___	
Decontamination residues?	___	___	
Process residues?	___	___	
Other (specify)?	___	___	
d. Decontamination procedures including: (265.112a.3)			
A list of equipment, containers, structures requiring decontamination?	X	___	
Sampling and analytical methods for determining whether soil contamination or decontamination residues are H.W.?	X	___	
Testing criteria for determining adequacy of clean-up?	X	___	
Methods of treatment or disposal of contaminated soils and residues?	X	___	

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VIII. Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	Yes	No	Comments
e. Estimate of the expected year of closure (265.112a.4)?	X		1987
f. Schedule for final closure activities (265.112a.4)?	X		
g. Does the schedule include:			
Total time required to close?	X		
Time required for intervening closure activities? (e.g., Time required for H.W. treatment, disposal, decontamination, and certification inspections.)	X		
4. Has the facility amended the plan whenever changes in operating practice or process design affect the plan or there is a change in the expected year of closure (265.112b)? (Plan must be amended within 60 days of the changes.)	X		
5. Has the facility submitted a closure plan to the RA at least 180 days before the date they expect to begin closure (265.112c)?	X		
(B) Time Allowed For Closure:			
1. Does the schedule for final closure allow for the following:			
a. Treatment, removal, or disposal of H.W. within 90 days after receipt of final volume of H.W. or after approval of closure plan (265.113a)?	X		~~N/A~~
b. Completion of closure plan activities within 180 days after receipt of final volume of H.W. or after approval of closure plan (265.113b)?	X		

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VIII. Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	Yes	No	Comments
(C) Disposal And Decontamination Of Equipment:			
1. For facilities that have completed closure activities, has all equipment and structures been properly disposed of or decontaminated by removing all H.W. and contaminated residues (265.114)?	X		
(D) Certification Of Closure:			
1. For facilities that have completed closure activities, has a certification by owner/operator and an independent registered professional engineer been submitted to the RA (265.115)?			N/A - closure not yet completed
(E) Partial Closure:			
1. Does the facility plan to close discreet regulated H.W. management units during the intended operating life?	N/A	X	- FACILITY PRESENTLY IN CLOSURE
If "Yes" complete compliance form for partial closure.			

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VIII. Closure and Post-Closure: - Continued
(Part 265 Subpart G)

Compliance Form For Partial Closure

	Yes	No	Comments
(E) Partial Closure:			
1. Does the closure plan describe how the facility will be partially closed (265.112a.1)?	___	___	N/A
2. Does the plan describe the size of areas partially closed?	___	___	
3. Does the plan describe the procedures for partial closure?	___	___	
4. Does the plan address maintenance activities, including: (265.112a.1)			
a. Visual inspections?	___	___	
b. Ground-water monitoring?	___	___	
c. Maintaining cover?	___	___	
d. Maintaining diversion structures?	___	___	
e. Controlling erosion?	___	___	
f. Maintaining vegetation?	___	___	
g. Maintaining site security systems?	___	___	
h. Leachate collection system?	___	___	
i. Gas collection system?	___	___	
j. Other (specify)?	___	___	
5. Does the plan describe the frequencies for each type of maintenance activity (265.112a.1)?	___	___	
6. Does the plan describe when the facility will be partially closed (265.112a.1)?	___	___	
7. Does the schedule for partial closure include: (265.112a.1)			
a. Date(s) of partial closure(s)?	___	___	
b. Total time required for each partial closure?	___	___	
c. Time required for intervening partial closure activities? (e.g., time required for waste removal, stabilization, treatment, disposal; placement of cover; vegetation; decontamination; certification.)	___	___	

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VIII. Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	Yes	No	Comments
(F) Post-Closure:			
1. Does the facility have a post-closure plan (265.118a)?	—	—	N/A Post-closure not expected to be needed. Should monitoring data indicate need for post-closure monitoring a post closure plan will be prepared and implemented by the company
2. Does the plan cover the maximum area expected to contain H.W. after closure, including: (265.118a)			
a. Landfills?	—	—	
b. Disposal surface impoundments?	—	—	
c. Land treatment facilities where H.W. will remain?	—	—	
d. Other remaining H.W. (specify)?	—	—	
3. Does the plan cover all areas where H.W. will remain that were active as of Nov. 19, 1980 (265.118a)?	—	—	
4. Does the plan provide for 30 years of post-closure care (265.117a)?	—	—	
5. Does the plan clearly identify the activities required in post-closure care (265.118a)?	—	—	
6. Does the plan clearly identify the frequencies for post-closure care activities (265.118a)?	—	—	
7. Does the plan describe ground-water monitoring, including: (265.118a.1)			
a. Number of wells?	—	—	
b. Sample collection activities and frequencies?	—	—	
c. Sample testing procedures and frequencies?	—	—	
d. Replacement of failed wells?	—	—	

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VIII. Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	Yes	No	Comments
8. Does the plan describe maintenance for waste containment structures, including the types of activities and frequency of activities necessary to maintain: (265.118a.2)			N/A - not a disposal site
a. Site security systems?	___	___	
b. Surveyed benchmarks?	___	___	
c. Facility monitoring systems?	___	___	
d. Final cover (erosion damage repair)?	___	___	
e. Vegetation (fertilizing and mowing)?	___	___	
f. Runoff collection and treatment systems?	___	___	
g. Runon control systems?	___	___	
h. Leachate collection, removal and treatment systems?	___	___	
i. Gas collection and treatment systems?	___	___	
j. Other (specify)?	___	___	
9. Does the plan identify the name, address and phone number of the post-closure period contact (265.118a.3)?	___	___	
10. Did the facility amend the plan whenever changes in operating practices, or process design, or events which occur during the active life of the facility, affect their post-closure plan (265.118b)? (Plan must be amended within 60 days after the changes or events occur.)	___	___	
11. Did the facility submit their post-closure plan to the RA at least 180 days before they expect to begin closure (265.118c)?	___	___	
12. Did the facility amend the plan whenever changes in monitoring or maintenance plans or events which occur during the post-closure care period affect their post-closure plan (265.118e)? (Facility must petition RA to amend plan in accordance with procedures specified in § 265.118f.)	___	___	

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VIII. Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	Yes	No	Comments
(G) Notice To Local Land Authority:			N/A - not a disposal facility
1. For disposal facilities, were the following documents submitted to the RA and local land authority within 90 days after closure was completed: (265.119)			
a. A survey plat indicating the locations and dimensions of landfill cells or other disposal areas with respect to permanently surveyed benchmarks?	___	___	_____
b. A record of the type, location, and quantity of H.W. disposed of within each cell or area of the facility?	___	___	_____
c. A record of the type, location, and quantity of the wastes disposed of before Nov. 19, 1980?	___	___	_____
(H) Notice In Deed To Property:			
1. For disposal facilities, did the owner of the property record in the deed a notation that will in perpetuity notify any potential purchaser of the property that the land was used to manage H.W. and its use is restricted under § 265.117c (265.120)?	___	___	_____

TABLE 1

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INVENTORY OF RCRA UNITS

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INSPECTOR G.B.RT

Designation	Description	
a	Building 223	Storage building for explosively contaminated dry paper and gloves contained in bags inside of fiber drums.
b	Building 207	Steel tanks contained in concrete tanks used to desensitize lead azide solution.
c1	502	Portable steel magazine lined with wood used to store dry propellant in bags inside of ammo cans.
c2	504	Portable steel magazine lined with wood used to store dry propellant in bags inside of ammo cans.
c3	506	Portable steel magazine lined with wood used to store dry propellant in bags inside of ammo cans.
d	Building 236	Storage building for explosively contaminated dry paper and gloves contained in bags inside of fiber drums.
e1, e2, e3	Portable Magazines	Portable wood magazines used to store propellant and propellant wastes contained in bags inside of ammo cans.
f	Burning cage	Steel and mesh cage used to burn explosively contaminated dry paper and gloves.
	Pans	Steel pans used to burn small amounts of explosives and propellants.
	Rails	Steel rails used to burn small amounts of dry explosives and propellants.
g	Two Burn Areas (Past)	Former areas used to burn dry paper, rags and gloves contaminated with explosives and propellants.
h	East Fork Detonation Range	Area used to detonate small explosive devices.
i	317 Surface Impoundment	Lined former surface impoundment used for storing liquid organic solvents prior to disposal off-site.
j	342 Surface Impoundment	Lined former surface impoundmend used for storing liquid stabilized phosphorus prior to disposal off-site.

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INSPECTOR GB KT

IX. Financial Requirements: (Part 265 Subpart H)

	Yes	No	Comments
(A) Cost Estimate For Closure:			
1. Has a written estimate been prepared of the cost of closing the facility (265.142a)?	X		
What is the amount of the closure cost estimate? $ _____			
2. Does the estimate equal the cost of closure at the point when the extent and manner of the operation would make closure the most expensive (265.142a)?	X		
3. Does the cost estimate cover all the activities in the closure plan (265.142a)?	X		
4. Has the cost estimate been adjusted for inflation within 30 days after each anniversary of the date on which the first cost estimate was prepared (265.142b)?	X		N/A - plan being implemented
5. Was the adjustment made by using an inflation factor derived from the Annual Implicit Price Deflator for Gross National Product as published by the U.S. Dept. of Commerce in its "Survey of Current Business" (265.142b)?			

Latest Annual Deflator = _____

Previous Annual Deflator = _____

Inflation Factor = _____ (latest deflator/previous deflator)

Current Cost Adjustment = $ _____ (latest adjusted estimate x inflation factor)

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INSPECTOR CB KT

IX. Financial Requirements: - Continued
(Part 265 Subpart H)

	Yes	No	Comments
6. Was the cost estimate revised whenever a change in the closure plan increased the cost of closure (265.142c)? (Revised estimate must be adjusted for inflation.)	___	___	Not Evaluated
7. Are the following kept at the facility during the operating life of the facility: (265.142d)			
a. Latest closure cost estimate?	___	___	
b. Latest adjusted closure cost estimate?	___	___	
8. Is there written documentation supporting the closure cost estimate?	___	___	
a. Workups from labor, material and equipment requirements?	___	___	
b. Contractor estimates and bids?	___	___	
c. Figures derived from cost estimating handbooks?	___	___	
d. Figures derived from operator experience?	___	___	
9. Does the estimate accurately reflect the cost of closure for similar types of facilities?	___	___	

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IX. Financial Requirements: - Continued
(Part 265 Subpart H)

	Yes	No	Comments
(B) Cost Estimate For Post-Closure Care:			
1. Has a written estimate been prepared of the annual cost of post-closure monitoring and maintenance of the facility (265.144a)?	___	___	Not Evaluated
What is the amount of the post-closure cost estimate? $ _____			
2. Is the annual estimate multiplied by 30 to cover the entire post-closure care period (265.144a)?	___	___	
3. Does the cost estimate cover all activities in the post-closure plan (265.144a)?	___	___	
4. Has the cost estimate been adjusted for inflation within 30 days after each anniversary of the date on which the first cost estimate was prepared (265.144b)?	___	___	
5. Was the adjustment made by using an inflation factor derived from the annual Implicit Price Deflator for Gross National Product as published by the U.S. Dept. of Commerce in its "Survey of Current Business" (265.144b)?	___	___	

Latest Annual Deflator = _____

Previous Annual Deflator = _____

Inflation Factor = _____ (Latest Deflator/Previous Deflator)

Annual Cost Adjustment = $ _____ (Latest Adjusted Estimate x Inflation Factor)

Post-Closure Cost Estimate = $ _____ (Annual Cost Adjustment x 30)

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INSPECTOR CB, RT

IX. Financial Requirements: - Continued
(Part 265 Subpart H)

	Yes	No	Comments
6. Was the cost estimate revised whenever a change in the post-closure plan increased the cost of post-closure (265.144c)? (Revised estimate must be adjusted for inflation.)	___	___	Not Evaluated
7. Are the following kept at the facility during the operating life of the facility: (265.144d)			
a. Latest post-closure cost estimate?	___	___	
b. Latest adjusted post-closure cost estimate?	___	___	
8. Is there written documentation supporting the post-closure cost estimate?	___	___	
a. Workups for labor, material and equipment requirements?	___	___	
b. Contractor estimates and bids?	___	___	
c. Figures derived from cost estimating handbooks?	___	___	
d. Figures derived from operator experience?	___	___	
9. Does the estimate accurately reflect the cost of post-closure for similar types of facilities?	___	___	

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INSPECTOR GB, RT

X. Use And Management Of Containers: (Part 265 Subpart I)

	Yes	No	Comments
1. Does the facility transfer H.W. from containers not in good condition or leaking to containers in good condition (265.171)?			N/A - no wastes stored or handled at this facility
2. Are containers compatible with H.W. stored in them (265.172)?			
3. Are containers stored closed (265.173a)?			
4. Are containers managed to prevent rupture or leakage (265.173b)?			
5. Are containers inspected weekly for leaks and deterioration (265.174)?			
6. Are ignitable or reactive wastes stored at least 50 feet from the facility's property line (265.176)?			
7. Are incompatible wastes stored in separate containers (265.177a)?			
8. Are H.W. not placed in unwashed containers that previously held an incompatible waste or material (265.177b)?			
9. Are containers holding a H.W. that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by suffecient distance or protected by means of a dike, berm, wall, or other device (265.177c)?			
10. Are containers that are not empty managed as a H.W. (261.7a.2)?			
11. For a container to be considered empty the facility must ensure that:			
a. No more than one inch of residue remains on bottom of container or inner lining (261.7b.1)?			
b. Containers that held an acutely H.W. are tripled rinsed using a solvent capable of removing the contents (261.7b.3)?			

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INSPECTOR GB, RT

XI. Tanks:
(Part 265 Subpart J)

	Yes	No	Comments
1. Is the treatment or storage of H.W. in tanks conducted so that it does not: (265.192a)			
a. Generate extreme heat or pressure; fire or explosion; or violent reaction?	___	___	N/A
b. Produce uncontrolled toxic or flammable mists, fumes, dusts, or gases?	___	___	
c. Damage the structural integrity of the tank?	___	___	
2. Are H.W. or treatment reagents placed in a tank so that they do not cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail (265.192b)?	___	___	
3. Do uncovered tanks have at least 2 feet of freeboard, or dikes, or other containment features (265.192c)?	___	___	
4. Where H.W. is continuously fed into a tank, is the tank equipped with a waste feed cutoff system or by-pass system to a stand-by tank (265.192d)?	___	___	
5. Does the facility conduct waste analysis and trial treatment or storage tests, or have they obtained written documentation on similar storage or treatment of similar waste under similar operating conditions before the tank is used to:			
a. Chemically treat or store a H.W. which is substantially different from waste previously treated or stored in the tank (265.193a.1)?	___	___	
b. Chemically treat H.W. with a substantially different process than was previously used (265.193a.2)?	___	___	

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INSPECTOR GBRT

XI. Tanks: - Continued
(Part 265 Subpart J)

	Yes	No	Comments
6. Are daily and weekly inspections done for the following:			
a. Discharge control equipment e.g., feed cutoff, bypass and drainage systems (Daily) (265.194a.1)?	___	___	N/A
b. Data gathered from monitoring equipment e.g., pressure and temperature gauges (Daily) (265.194a.2)?	___	___	
c. Level of waste in uncovered tanks (Daily) (265.194a.3)?	___	___	
d. Construction materials of tank e.g., corrosion, leaking fixtures or seams (Weekly) (265.194a.4)?	___	___	
e. Discharge confinement structures e.g., dikes (Weekly) (265.194a.5)?	___	___	
7. At closure, are all H.W. and residues removed from tanks and associated equipment and structures (265.197)?	___	___	
8. Are ignitable or reactive waste treated, rendered, or mixed before or immediately after placement in a tank so that the resulting waste no longer meets the definition of ignitability or reactivity (265.198a.1)? or	___	___	
9. Are ignitable or reactive waste stored or treated in such a way that it is protected from conditions which may cause the waste to ignite or react (265.198a.2)?	___	___	
10. Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981) (265.198b)?	___	___	
11. Are incompatible wastes stored in separate tanks (265.199a)?	___	___	
12. Are H.W. not placed in unwashed tanks that previously held an incompatible waste or material (265.199b)?	___	___	

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INSPECTOR GB, RT

XII. Surface Impoundments: (Part 265 Subpart K)

	Yes	No	Comments
1. Do impoundments have at least 2 feet of freeboard (265.222)?	___	___	N/A - Surface Impoundments are undergoing closure
2. Do earthen dikes have protective cover to minimize wind and water erosion and to preserve their structural integrity (265.223)?	___	___	
3. Does the facility conduct waste analysis and trial treatment tests, or have they obtained written documentation on similar treatment of similar waste under similar opreating conditions before the impoundment is is used to:			
a. Chemically treat a H.W. which is substantially different from waste previously treated in the impoundment (265.225a.1)?	___	___	
b. Chemically treat H.W. with a substantially different process than was previously used (265.225a.2)?	___	___	
4. Is the treatment of H.W. in impoundments conducted so that it does not: (265.225a.2)			
a. Generate extreme heat or pressure; fire or explosion; or violent reaction?	___	___	
b. Produce uncontrolled toxic or flammable mists, fumes, dusts, or gases?	___	___	
c. Damage the structural integrity of the liner?	___	___	
d. Threaten human health or the environment?	___	___	
5. Is the freeboard level inspected at least daily (265.226a.1)?	___	___	
6. Are the dikes inspected weekly for evidence of leaks, deterioration or failure (265.226a.2)?	___	___	

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XII. Surface Impoundments: - Continued
(Part 265 Subpart K)

	Yes	No	Comments
7. At closure, has the facility removed from the impoundments: (265.228a)			N/A
a. Standing liquids?	—	—	
b. Waste and waste residues?	—	—	
c. The liner, if any?	—	—	
d. Underlying and surrounding contaminated soil?	—	—	
8. At closure, has the facility demonstrated under § 261.3 c & d that none of the materials listed in (7) remaining at any stage of removal are H.W. (265.228b)?	—	—	
9. If the answers to (7) & (8) are no, has the facility closed the impoundment and provided post-closure care as a landfill (265.228c)?	—	—	
10. Is an ignitable or reactive waste treated, or mixed before or immediately after placement in an impoundment so that the resulting waste no longer meets the definition of ignitability or reactivity (265.229a.1)?	—	—	
11. Does the facility take precautions to ensure that incompatible wastes and materials are not placed in the same impoundment (265.230)?	—	—	

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XIII. Waste Piles: (Part 265 Subpart L)

	Yes	No	Comments
1. Are waste piles covered or protected from dispersal by wind (265.251)?	___	___	No Waste Piles
2. Is a representative sample of waste from each incoming movement analyzed to determine its compatibility with other waste in the pile (265.252)?	___	___	
3. For waste piles where the leachate or run-off from the pile is a H.W.:			
a. Is the pile placed on an impermeable base that is compatible with the waste; run-on is diverted away from the pile; leachate and run-off is collected and managed as a H.W. (265.253a)? -or-	___	___	
b. The pile is protected from precipitation and run-on (265.253b.1)? -and-	___	___	
c. No liquids or wastes containing free liquids are placed in the pile (265.253b.2)?	___	___	
4. For facilities that add ignitable or reactive wastes to an existing pile, can the following be demonstrated:			
a. The resulting waste mixture no longer meets the definition of ignitable or reactive waste and the mixing will not cause an uncontrolled reaction (265.256a.1)?	___	___	
b. The waste is protected from materials or conditions that might cause them to ignite or react (265.256a.2)?	___	___	
5. Does the facility take precautions to ensure that incompatible wastes and materials are not placed in the same waste pile (265.257a)?	___	___	
6. Are piles of H.W. that are incompatible with materials stored nearby separated by suffecient distance or protected by some structural device e.g., dike, wall or berm (265.257b)?	___	___	
7. Are H.W. not placed on the same area where incompatible wastes were previously piled (265.257c)?	___	___	

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XIV. Land Treatment: (Part 265 Subpart M)

	Yes	No	Comments
(A) General Operating Requirements:			
1. Is treated H.W. capable of biological or chemical degradation (265.272a)?	___	___	No Land Treatment
List H.W. placed in land treatment unit.			
2. Is run-on control system designed, constructed, operated, and maintained to keep flow off the active portions of the facility during peak discharge from at least a 25-year storm (265.272b)?	___	___	
3. Is run-off management system designed, constructed, operated, and maintained to collect and control water volume at least equivalent to a 24-hour, 25-year storm (265.272c)?	___	___	
4. Are collection and holding facilities associated with run-on and run-off control systems managed to maintain design capacity of system (265.272d)?	___	___	
5. Is the treatment zone managed to control wind dispersal (265.272e)?	___	___	
(B) Waste Analysis:			
1. Before placing H.W. in or on a land treatment unit, has the facility determined the following:			
a. Concentrations in the waste of any substance that cause a waste to exhibit the EP toxicity characteristic (265.273a)?	___	___	
b. For any waste listed in Part 261, Subpart D, the concentration of any substance which caused the waste to be listed as a H.W. (265.273b)?	___	___	
c. If food chain crops are grown, the concentrations in the waste of As, Cd, Pb, & Hg, unless written, documented data shows that the constituent is not present (265.273c)?	___	___	

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XIV. Land Treatment: - Continued
(Part 265 Subpart M)

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	Yes	No	Comments
(C) Unsaturated Zone Monitoring:			
1. Does the facility have an unsaturated zone monitoring plan (265.278a)?	___	___	No Land Treatment
2. Has the facility implemented the plan (265.278a)?	___	___	
3. Is the plan designed to detect vertical migration of H.W. and H.W constituents under active portions of the land treatment unit (265.278a.1)?	___	___	
4. Is the plan designed to provide information on the background concentrations of H.W. and H.W. constituents in similar but untreated soils nearby (265.278a.2)?	___	___	
5. Is background monitoring conducted before or in conjunction with monitoring required in 265.278a.1 (265.278a.2)?	___	___	
6. Does the plan include, at a minimum:			
a. Soil-monitoring using soil cores (265.278b.1)?	___	___	
b. Soil-pore water monitoring using devices such as lysimeters (265.278b.2)?	___	___	
7. Has the facility demonstrated the following in their plan:			
a. The depth at which soil and soil-pore water samples are to be taken is below the depth to which the waste is incorportated into the soil (265.278c.1)?	___	___	
b. The number of soil and soil-pore water samples to be taken is based on the variability of the H.W. constituents in the waste and the soil type(s) (265.278c.2)?	___	___	
c. The frequency and timing of soil and soil-pore water sampling is based on the frequency, time, and rate of waste application, proximity to ground-water, and soil permeability (265.278c.3)?	___	___	

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XIV. Land Treatment: - Continued
(Part 265 Subpart M)

	Yes	No	Comments
8. Is the plan and the rationale used in developing this plan kept at the facility (265.278d)?	___	___	No Land Treatment
9. Does the facility analyze the soil and soil-pore water samples for the H.W. constituents that were found in the waste during the waste analysis (265.278e)?	___	___	
(D) Recordkeeping:			
1. Are records kept regarding application dates and rates, quantities, and locations of all H.W. placed in the land treatment unit (265.279)?	___	___	
(E) Closure and Post-Closure:			
1. Does the closure plan and post-closure plan address the following objectives and indicate how they will be achieved:			
a. Control of migration of H.W. and H.W. constituents from the treatment zone into the ground-water (265.280a.1)?	___	___	
b. Control of the release of contaminated run-off from the unit into surface water (265.280a.2)?	___	___	
c. Control of the release of airborne particulate contaminants caused by wind erosion (265.280a.3)?	___	___	
d. Compliance with 265.276 (growth of food chain crops) (265.280a.4)?	___	___	
2. Were the following factors considered in addressing the closure and post-closure care objectives:			
a. Type and amount of H.W. and H.W. constituents applied to the land treatment unit (265.280b.1)?	___	___	
b. Mobility and expected rate of migration of H.W. and H.W. constituents (265.280b.2)?	___	___	

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XIV. Land Treatment: - Continued
(Part 265 Subpart M)

	Yes	No	Comments
c. Site location, topography, and surrounding land use with respect to the potential effects of pollutant migration (e.g., proximity to ground water, surface water and drinking water sources) (265.280b.3)?	___	___	No Land Treatment
d. Climate, including amount, frequency & pH of precipitation (265.280b.4)?	___	___	
e. Geological and soil profiles; surface & subsurface hydrology of the site; soil characteristics, including cation exchange capacity, total organic carbon, and pH (265.280b.5)?	___	___	
f. Unsaturated zone monitoring information (265.280b.6)?	___	___	
g. Type, concentration, and depth of migration of H.W. constituents in the soil as compared to their background concentrations (265.280b.7)?	___	___	
3. Were the following methods considered in addressing the closure and post-closure care objectives:			
a. Removal of contaminated soil (265.280c.1)?	___	___	
b. Placement of final cover, considering: (265.280c.2)			
Functions of cover (e.g., infiltration control, erosion and run-off control, and wind erosion control?	___	___	
Characteristics of the cover, including material, final surface contours, thickness, porosity and permeability, slope, length of run of slope and type of vegetation on the cover?	___	___	
4. Does the closure plan provide for the following during the closure period:			
a. Continuation of the unsaturated zone monitoring program (soil-pore liquid monitoring may be terminated 90 days after last application of waste (265.280d.1)?	___	___	

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XIV. Land Treatment: - Continued
(Part 265 Subpart M)

	Yes	No	Comments
b. Maintenance of run-on control system (265.280d.2)?	___	___	No Land Treatment
c. Maintenance of run-off management system (265.280d.3)?	___	___	
d. Controlling wind dispersal of H.W. (265.280d.4)?	___	___	
e. Closure certification by both owner or operator and an independent qualified soil scientist (265.280e)?	___	___	
5. Does the post-closure plan provide for the following during the post-closure care period:			
a. Continuation of the soil-core monitoring program (265.280f.1)?	___	___	
b. Restriction of access to the unit as appropriate (265.280f.2)?	___	___	
c. Assurance of compliance with 265.276 (food chain crops) (265.280f.3)?	___	___	
d. Controlling wind dispersal of H.W. (265.280f.4)?	___	___	
(F) Requirements For Ignitable Or Reactive Waste:			
1. Are ignitable or reactive wastes immediately incorporated into the soil so that either:			
a. The resulting waste mixture no longer meets the definition of ignitable or reactive waste (265.281a.1); and Section 265.17b is complied with (265.281a.2)? or	___	___	
b. The waste is managed in such a way that it is protected from conditions which may cause it to ignite or react (265.281b)?	___	___	
(G) Requirements For Incompatible Wastes:			
1. Does the facility ensure that incompatible wastes are not placed in the same unit (265.282)?	___	___	

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XV. Landfills:
(Part 265 Subpart N)

	Yes	No	Comments
(A) General Operating Requirements:			
1. Is the run-on control system capable of preventing flow onto active portions during peak discharge from a 25-year storm (265.302a)?	___	___	No Landfills
2. Is the run-off management system capable of collecting and controlling the water volume resulting from a 24-hour, 25-year storm (265.302b)?	___	___	
3. After storms are the run-on and run-off control systems returned to their design capacities (265.302c)?	___	___	
4. Are H.W. managed to prevent wind dispersal (265.302d)?	___	___	
3) Surveying And Recordkeeping:			
1. Does the facility maintain the following items in the operating record:			
a. On a map, the exact location, dimensions and depth of each cell with respect to permanently surveyed benchmarks (265.309a)?	___	___	
b. The contents of each cell and the location of each H.W. type within each cell (265.309b)?	___	___	
(C) Closure and Post-Closure:			
1. Has a final cover been placed over the landfill and does the closure plan specify the function and design of the final cover (265.310a)?	___	___	

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XV. Landfills: - Continued
(Part 265 Subpart N)

	Yes	No	Comments
2. Does the closure and post-closure plans address the following objectives and indicate how they will be achieved: (265.310b)			
a. Control of pollutant migration from the facility via ground-water, surface water, and air (265.310b.1)?	___	___	No Landfills
b. Control of surface water infiltration including prevention of pooling (265.310b.2)?	___	___	
c. Prevention of erosion (265.310b.3)?	___	___	
3. Are the following factors addressed with respect to the objectives stated in § 265.310b:			
a. Type and amount of H.W. and H.W. constituents in the landfill (265.310c.1)?	___	___	
b. The mobility and expected rate of migration of H.W. and H.W. constituents (265.310c.2)?	___	___	
c. Site location, topography, and surrounding land use, with respect to the potential effects of pollutant migration (e.g., proximity to ground-water, surface water, and drinking water sources.)(265.310c.3)?	___	___	
d. Climate, including amount, frequency, and pH of precipitation (265.310c.4)?	___	___	
e. Characteristics of the cover including type of material, source, final surface contours, thickness, porosity, permeability, slope, lenght of run of slope, and type of vegetation on the cover (265.310c.5)?	___	___	
f. Geological and soil profiles and surface and subsurface hydrology of the site (265.310c.6)?	___	___	

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XV. Landfills: - Continued
(Part 265 Subpart N)

	Yes	No	Comments
4. During the post-closure care period does the facility:			
a. Maintain the function and integrity of the final cover (265.310d.1)?	___	___	No landfill
b. Maintain and monitor the leachate collection, removal, and treatment system to prevent excess accumulation of leachate in the system (265.310d.2)?	___	___	
c. Maintain and monitor the gas collection system to control the vertical and horizontal escape of gases (265.310d.3)?	___	___	
d. Protect and maintain surveyed benchmarks (265.310d.4)?	___	___	
e. Restrict access to the landfill (265.310d.5)?	___	___	
(D) Requirements For Ignitable Or Reactive Wastes:			
1. Are ignitable or reactive wastes treated, rendered, or mixed before or immediately after placement in the landfill so that the resulting waste mixture does not:			
a. Exhibit the characteristics of ignitability or reactivity (265.312a.1)?	___	___	
b. Generate extreme heat or pressure, fire or explosion, or violent reaction; produce uncontrolled toxic or flammable air emissions; damage the liner; threaten human health and the environment (265.312a.2)?	___	___	

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XV. Landfills: - Continued
(Part 265 Subpart N)

	Yes	No	Comments
b. All free-standing liquid is eliminated by mixing with absorbent or solidification (265.314b.1)?	___	___	No Landfills
[containers that are very small (ampules); are designed to hold free liquids (batteries); or are lab packs are not subject to these restrictions]			
(H) Requirements For Containers:			
1. Are empty containers crushed flat, shredded, or similarly reduced in volume before they are buried in the landfill (265.315a)?	___	___	
(I) Requirements For Disposal Of Lab Packs In Overpacked Drums:			
1. Do lab packs placed in the landfill meet the following requirements: (265.316)			
a. Lab packs are non-leaking?	___	___	
b. Lab packs are compatible with waste?	___	___	
c. Lab packs are securely sealed?	___	___	
d. Lab packs comply with DOT specs?	___	___	
e. Lab packs are overpacked in open head DOT spec drum 110 G or less?	___	___	
f. Suffecient quantity of aborbent material has been placed in drum to completely absorb all liquid contents of lab packs?	___	___	
g. Drum is full after packing with lab packs and absorbent?	___	___	
h. Absorbent material is compatible with waste?	___	___	
i. Incompatible wastes are not placed in same drum?	___	___	
j. Reactive wastes, other than cyanide- or sulfide-bearing wastes are treated or rendered non-reactive prior to placement in lab packs?	___	___	

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XV. Landfills: - Continued
(Part 265 Subpart N)

	Yes	No	Comments
(E) Requirements For Ignitable Wastes Disposed Of In Containers: (265.312b)			
1. Are wastes protected from materials or conditions which may cause them to ignite?	___	___	No Land fills
2. Are wastes disposed of in non-leaking containers?	___	___	
3. Are wastes carefully handled and placed so as to avoid heat or sparks?	___	___	
4. Are wastes covered daily with soil?	___	___	
5. Are wastes disposed in cells that do not contain other wastes which may generate heat and cause ignition?	___	___	
(F) Requirements For Incompatible Wastes:			
1. Are incompatible wastes and materials not placed in the same landfill cell (265.313)?	___	___	
(G) Requirements For Liquid Wastes:			
1. For facilities that accept bulk liquid waste or waste containing free liquids, are the following requirements met:			
a. The landfill has a liner and leachate collection and removal system as specified in § 264.301a (265.314a.1)?	___	___	
b. Before disposal, the liquids are treated or stabilized, chemically or physically, so that free liquids are no longer present (265.314a.2)?	___	___	
2. For facilities that accept liquids in containers, are the following requirements met prior to disposal:			
a. All free-standing liquid is removed by decanting (265.314b.1)?	___	___	